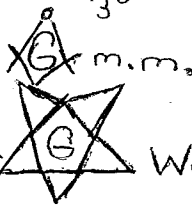


AMENDED COMPLAINT AMENDED RELIEF
IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

Devoris Antoine Newson
1-2017 WITHOUT PREJUDICE
ALL RIGHTS PRESERVED

(Enter above the full name of the plaintiff
or plaintiffs in this action.)



W.P.

vs.

TRINITY SERVICES GROUP INC.

TRINITY STAFF WAGNER

TRINITY FAIRBANKS, Core Civic, Captain Smith, Co# Spence, Co# Leon

(Enter above the full name of the defendant
or defendants in this action.)

* Jury trial Demanded by plaintiff

* ART III COMMON LAW COURT has
BEEN DEMANDED BY Plaintiff as
well

* Summons is Attached hereto
Certified mail To be signed by
clerk with seal and Returned
To Plaintiff for service to
Defendants

CASE# 3:23-CV-00081

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts
involved in this action or otherwise relating to your imprisonment? Yes () No (X)

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more
than one lawsuit, describe the additional lawsuits on another piece of paper, using
the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: NONE

Defendants: NONE

2. Court (if federal court, name the district; if state court, name the county):

N/A

3. Docket Number: N/A

4. Name of judge to whom case was assigned: N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still
pending?)

N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. Place of Present Confinement: TROUSDALE TURNER CORRECTIONAL complex

A. Is there a prisoner grievance procedure in the institution?

Yes (☒) No (☐)

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes (☒) No (☐)

C. If your answer is Yes: Filed 51-C Notified Unit Manager Robinson, Warden Worn

1. What steps did you take? Filed Grievance, complained to TDC J03

COORDINATOR Blackwell, WARDEN FRINK, Filed TITLE VI complaint

2. What was the result? Chief Harris ordered IBE Allowed to work,

TDC Commissioner investigation initiated, WARDEN FRINK Disapprove

D. If your answer is No, explain why not: of there ACT

Involved TDC
Commissioner

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff DEVORIS ANTOINE NEWSON

Address TTCC, WC130, 140 MARION WAY, HARTSVILLE T.N. 37074

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Food STEWART WAGNER is employed as

Food STEWART

at TRINITY SERVICES Group INC.

C. Additional Defendants: Food Service Dir. FAIRBANKS (Trinity Services Group

TRINITY SERVICES GROUP INC. "C/O DAWN HAMMOND, PHR"

477 COMMERCE DR. OLSMAR, FL 34677

(CoreCivic Inc. CEO/President Damon Hinniger)

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

→ SEE P.

1. Around 2-1-22 I was Assigned to work TTCC Kitchen as a Server
2. After 8 months, I became aware Fairbanks an Wagner Refused to process My work credits
3. I Addressed this issue with Wagner an Fairbanks, who in turn stated IF I DON'T like it Quit, WE MAKE OUR OWN CUSTOMS here. this is our kitchen This was over or around 8-8-22
4. I Filed a grievance, on 8-10-22 Asserting Constitutional Violations concerning this matter 8th an 14th, Grievance STATE Lopez Destroyed It
5. Around 10-10-22 around 6:00am. STEWARD WAGNER FIRED ME, WHEN ASKED her why she was firing me, she stated ITS TRINITY SERVICES Policy and custom To Fire whoever they WANT, Blackwell can send you up here and I'll send YOUR Black But Back...
6. 10-11-22 I attempted to address Issue with Dir. To Fairbanks, around 2:00pm SHE SAID TO WHAT? I SAID TO BE REMOVED FROM FOOT BACK IN THERE kitchen, or else...

Revised 4/18/08

pg. 2 statement of Claims

7. On 10-13-22 I filed a grievance to TISC Board addressing the issues stated above against Fairbanks and Wagner denying me my Rights under the 8th and 14th U.S. Const. Amendments, discrimination and denial of work credits
8. Sgt Lopez of the Grievance Board destroyed my Grievance it was never returned.
9. On 11-18-22 Kitchen officer Leon told me after several days of being denied the Right to work that Fairbanks placed fired beside my name and as T.D.O.C officer he was enforcing ~~on Fairbanks~~ Trinity Services Customs and I would not return to the Kitchen
10. On 11-18-22 I filed a grievance addressing this issue asserting denial of due process, denied the right to work, work credits, Being Fired, Kitchen Officer Leon's actions Fairbanks actions as well.
11. On 12-30-22 the grievance was returned and I was told on the grievance by chief Harris that I could not be denied the right to work, and I was to return and receive pay and credits
12. On 1-10-23 New Jane Doe Kitchen officer allowed me to work the 2:00 a.m. shift.
13. On 1-10-23 From 2:00 a.m. - 5:00 a.m. Trinity Server Daily incited a riot against me while working, informed numerous Kitchen workers to keep me out of her face, they began to ask how I got my job back after they got me fired.
14. During this time on camera I was threatened to be beat, stabbed, and jumped by numerous inmates due to Daily's remarks to several Kitchen workers stating she didn't like me, and to keep my name out of her mouth.
15. This was all due to the fact that I was allowed to work.
16. In return daily stated, I should have never come back to leave the Kitchen and to beware of the kid that would be sent on my life.
17. I then was told to leave the Kitchen in which I complied.
18. Later that evening while at the Law Library I spoke with Job coordinator Blackwell concerning this she told me in return to file a complaint.
19. Blackwell also stated Trinity services had done the to many inmates and that they had been warned several times to stop violating T.D.O.C. policy's.
20. Blackwell stated Warden Trunk was notified, TOOC Commissioner as well.
21. On 2-11-23 around 3:00 a.m. through 5:00 a.m. in Unit WIC 130 I was snatched off my bunk and beat and almost stabbed to death by 2 inmates associated with Trinity Food services. they stated I should have stayed out the Kitchen.
22. I was then pushed out the pod by the 2 inmates on camera, one of whom had been let in by CCA staff CO# (Spencer) who did not reside in WIC.
23. I then tell ~~Spencer~~ CO# what happened, he reports to ~~Spencer~~ Sgt. in refusing to go back in the pod during covid in retaliation to avoid being fired.
24. Sgt. comes searches me on camera and threatens to spray (me) if I move, I tell him I don't like him going to sue him.

pg. 3 Statement of Claim's

25. He then ask me the issue, I show him my injury's, I explain the guard let another inmate from another pod in our unit and I was almost murdered.
26. When they escorted to medical, were then checked for injury's I make a 51-C statement, of the incident and provide Captain Smith, Unit manager Robinson, Warden Normin with a copy.
27. The 51-C includes everything that happened including the fact Core Civic staff refused to sign the 51-C incident.
28. When I told Captain Smith this same morning what happened, I was taken out of medical placed in a booking holding cell and a later told I refused a cell assignment R.C.A. in retaliation in order to avoid investigations.
29. On 7-11-23 Unit Manager Robinson called me in her office around 12 p.m. Reviewed the camera and corroborated my 51-C statement.
30. I stated I needed to be shipped to a safer facility, she asked if I needed p.c. or protective custody.
31. I told her though my life's in danger, I cannot afford to be placed in confinement without access to the law library.
32. ~~Since this time I refuse to stay at night staying at the 2nd floor in my~~ I also stated that P.C. at TCC is the worst place to be inmates have been killed in p.c.
33. I stated TCC has been covering up inmates death's here for the last 2 yrs if I had died surely mine death would have been covered up as well.
34. I then sent copies of my 51-C statement to assist, Warden Normin, Chief Warden News channel 4 investigates, My Father, Human Right Commission, By Mail.
35. Since then I suffered "Migraine Headaches" "Increased" "P.T.S.D. symptoms" "Anorexia" "Paranoia" and increased sleep paralysis from my head injury's.
36. I've filed medical request which have been ignored and not returned.
37. Upon speaking to the chief warden on 7-15-23 about the incident, he stated in his small time here at TCC he is not surprised Core Civic has made it custom, To maximize galaxy wages they minimize staff which increases security risks.
38. He then stated which is why so many inmates have died here in the last yr.
39. It is now 2-5-23 and at least 3 more inmates have died here, I was found dead in his cell after 3 days, and in order to cover-up these deaths, they (warden) turns off all phones preventing inmates from notifying anyone.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

- Enter a declaratory order STATING Plaintiffs U.S. 14th amend. Right WAS violated, denied due process Equal protection of LAW, 8th cruel and Unusual punishment WAS ESTABLISH
- Injunction Removing Wagner And Fairbanks From Trinity Service employment, order I BE GIVEN 180 days Work CREDITS
- 2. TRINITY FOOD SERVICE - OFFICIAL COMPACTY 1million Dollars In compensatory Damages 1million In punitive Damages
- 3 Wagner Individual Compacity \$100000 punitive and compensatory
- 4 Fairbanks Individual Compacity \$100000 punitive and compensatory DAMAGES, \$100,000 In court cost, Fees (Attorney Fees)

1st amend U.S. Const.
Retraillation
5th Due process

VI. Jury Demand

I would like to have my case tried by a jury. Yes (X) No (). Common Law Jury Trial
DEMAND 7th Amends Const. U.S.) Activate ART III "Common Law sui juris"
I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief. ATTENTION JUDGE ACTIVATE COMMON LAW JURIS

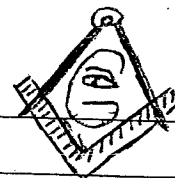
Fed.R. Civ. P. 38(A) 39(A)

Signed this 15th day of January, 2023

ART. III COURT

1 amend U.S. Const. (Retraillation) (Individual compacity)

Captain Smith : \$1 Million in compensatory
\$1 Million in punitive damages
CO# Spence : \$1 Million in compensatory
\$1 Million in punitive damages
CO# Leon : \$1 Million in punitive damages
\$1 Million in compensatory damages



ALL RIGHTS RESERVED 1-207
(Signature of Plaintiff/Plaintiffs)

5 Temporary Injunction, Be placed At a SAFE Minimum custody facility for U.S. Army Veterans at a actual STATE PRISON NOW-CCA For my own safety

6 Trinity Staffs Daily individual compacity \$1 Million and compensatory damages (1st U.S. Const. Amends Retraillation)

7 Core Civic official compacity \$10,000,000 dollars in punitive in compensatory damages (Inadequate Security, STAFF, Protection etc.)

8. State all Request for Relief are due to discrimination violation of my constitutional rights, attempted murder, negligence, inadequate staff, inadequate security, irreparable psychological damage, as well as physical injuries

STATEMENT OF ALL DEFENDANT REMINDER, NEVER PUT YOUR HANDS ON THE COURT OF PRINCEHAN Master M...
Revised 4/18/08
Case 3:23-cv-00051 Document 31 Filed 06/28/23 Page 5 of 9 PageID #: 151


In the U.S.D.C.
Middle District
at Nashville T.N.
DEVORIS NEWSON V. TRINITY FOODS, ET. AL.
Case 3:23-cv-00081

Notice To Judge

Due to the Judge Eli Richardson Misconstruing My original amended complaint I have taken the liberty to file a 2nd amended complaint with in depth detail so that there will be no misunderstanding. Before any party is served.

- * Also as the clerk has Requested I've sent only 1 complaint along with the 30 summons, I've forwarded an extra copy to be filed and mailed back to me for my records

Certificate Service
Filed By U.S. Mail This 16th day of June 2023

Sig. 
DEVORIS NEWSON #9546176
G.P.J.R. (323)
10501 Montana Ave.
El Paso T.X. 79988

Dist Judge Eli Richardson
Magistrate Judge ~~Beth~~ Barbara

RECEIVED

JUN 2-7 2023

U.S. District Court
Middle District of TN

Notice To Clerk

- * As you requested 20 summons correctly done
- * 2 copies of 2nd Amended complaint to be filed & to be returned...
- * I Request an updated case summary docket sheet


DEVOR'S NEWSON

- * I also placed the original amended complaint herein to avoid any confusion or misunderstanding's

E.P.J.A. (323)
12501 Montana Ave.
El Paso, Tex. 79938

[illegible]

JUN 27 2023

U.S. District Court
Middle District of TN

U.S. Clerk of Court's Office
Middle Dist. of Tenn.
719 Church Street
Nashville T.N. 37203

Alberto

Va

2-11

SHAM
CONDIT

+5 Vitamin
& Oils

12.5 FL OZ (370ml)

6-21-23

4 EGAL MAIL

Classic Clean

- Helps relieve itchy scalp & dryness

ALCOHOL-FREE

16 FL 02 (4/2/11)

VOS 5 VITAMINS

Looking vibrant and beautiful. That's the secret of VOS! Alberto VOS has a unique formula that leaves hair looking healthy and beautiful. That's the secret of VOS!

VITAMIN A	VITAMIN B	VITAMIN C	VITAMIN D	VITAMIN E
VITAMIN K	VITAMIN L	VITAMIN M	VITAMIN N	VITAMIN O

VOS 5 VITAMINS

VITAMIN A VITAMIN B VITAMIN C VITAMIN D VITAMIN E VITAMIN K VITAMIN L VITAMIN M VITAMIN N VITAMIN O

VOS 5 VITAMINS

VITAMIN A VITAMIN B VITAMIN C VITAMIN D VITAMIN E VITAMIN K VITAMIN L VITAMIN M VITAMIN N VITAMIN O

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EL PASO COUNTY
JAIL

SHAMPOO & TONER

SHAMPOO CONDITION

210

PARABEN FREE
SILICONE FREE

